

RECEIVED

JUL - 8 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

In the Matter of)	
)	
Amendment of Part 68 of)	RM-8492
the Commission's Rules to)	
Accommodate Terminal)	
Equipment Providing 1.544 Mbps)	
Digital Services)	

Motion for Extension of Time

On June 14, 1994, Alcatel Network Systems, Inc. ("Alcatel") filed a Petition for Rulemaking ("Petition") requesting the Commission to amend Part 68 of the Commission's Rules, 47 C.F.R. §68.1 et seq. The Commission established a pleading cycle for this Petition by Public Notice, DA 94-667, on June 23, 1994 ("Public Notice"). Comments are due July 22, 1994, and Reply Comments are due August 22, 1994.

In its Petition, Alcatel claims that while terminals connected to 1.544 Mbps Digital services are subject to Part 68, Subpart D, these Rules are inconsistent with industry requirements for 1.544 Mbps digital terminals using a DSX interface. (Public Notice, p. 1) Alcatel contends industry standards -- rather than Part 68 rules -- should govern digital terminals using DSX interfaces in a controlled office environment.

The User Premises Equipment Division of the Telecommunications Industry Association ("TIA") believes the Petition raises important policy and technical issues that require a careful analysis by potentially affected parties. In

No. of Copies rec'd
List ABCDE

045

addition to technical questions of network harm and appropriate Part 68 Rules to protect against such harms, the Petition also discusses use of industry standards as an alternative to Commission Rules, which is an important policy question. Since TIA's Engineering Committees are American National Standards Institute ("ANSI") accredited, TIA also has a significant interest in standards issues. In addition to the Rulemaking issues raised in the Petition, Alcatel also requests Special Temporary Authority and a Waiver of the Commission's Rules. Thus, legal and procedural questions must also be reviewed. Given the importance of all of these matters to the industry at large, TIA requests that the Comment date be extended one month until August 22, 1994, and the Reply date extended until September 22, 1994, in order to allow adequate time for all parties to review the technical and policy issues raised by the Petition.

TIA sponsors Engineering Subcommittee TR-41.9 which focuses on the technical issues contained in Part 68. Commission Staff has frequently sought the recommendations of this group on Part 68 technical matters. A special meeting of this group has been called for July 19, 1994, to review the Alcatel Petition. Since Alcatel, the Petitioner, is a TIA member, it is free to participate in this meeting and present the technical matters raised in its Petition which should help clarify the issues in the record.

The Part 68 Ad Hoc Administrative Procedures Working Group has a meeting scheduled for July 18, 1994, and can review non-technical matters raised in the Petition. Since participants in these types of industry activities have extremely busy calendars, it is difficult to schedule meetings on shorter notice to ensure affected parties have notice and can attend to offer their expertise. After a careful analysis, Comments need to be prepared and circulated to a large group for concurrence prior to filing. Thus, more time is

necessary when consensus from a large group is being sought, however, that industry consensus is an important part of record-building on technical matters.

TIA recognizes that Commission policy is to not routinely grant extensions of time. However, since the public interest will be served by the production of a better record in this matter with a brief delay, and since the Petition raises important technical and policy questions that affect more than just the Petitioner, TIA believes its brief extension request is warranted in this case.

CONCLUSION

For the reasons stated herein, TIA requests the Comment date be extended until August 22, 1994, and the Reply Comment date be extended until September 22, 1994.

Respectfully submitted,

**Telecommunications Industry
Association, User Premises
Equipment Division**

By: 

Ron Angner, Chairman
User Premises Equipment
Division

Dan Bart
Vice President Technical and
Regulatory Affairs, Suite 800
2001 Pennsylvania Ave, N.W.,
Washington, DC 20006

July 8, 1994

202-457-4936

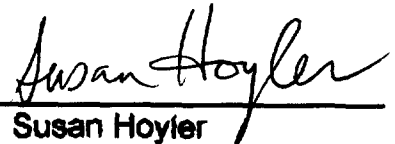
CERTIFICATE OF SERVICE

I, Susan Hoyer, certify that a copy of the attached Motion for Extension of Time of the User Premises Equipment Division of the Telecommunications Industry Association was sent, first-class mail, postage-pre-paid, on July 8, 1994, to

Robert J. Miller
Gardere & Wynne, L.L.P.
1601 Elm Street, Suite 3000
Dallas, Texas 75201
Counsel for Alcatel.

ITS (hand carry to box in Secretary's Office)

Chief, Domestic Services Branch
Common Carrier Bureau
Federal Communications Commission
Washington, DC 20554



Susan Hoyer